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Page 1 of 1 PageID #:



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January 16, 2024

NIXON PEABODY

Via ECF

The Honorable Anne Y. Shields, U.S.M.J. United States District Court for the Eastern District of New York 100 Federal Plaza Central Islip, New York 11722

RE: Wood v. National Park Services, et al. Case No. 23-cv-06249-NJC-AYS

Dear Judge Shields:

This Firm represents Plaintiff Samuel Wood in the above-referenced action. We write pursuant to the Scheduling Order entered on December 12, 2023 to advise the Court that Defendants produced the administrative record on Friday, January 12, 2024. The administrative record produced by Defendants consists of eighty-seven pages bates numbered AR 0001 – AR 0087. On or before February 16, 2024, Plaintiff intends to move for: (a) summary judgment for an Order: (i) declaring that Defendants acted in a manner that was arbitrary and capricious, an abuse of discretion, or otherwise not in accordance with law; (ii) vacating and setting aside the suspension of Plaintiff's Essential Services Permit; and (iii) for reasonable attorney fees; or in the alternative (b) discovery outside of the administrative record.

Respectfully submitted,

Timothy D. Sini

Partner

TDS